

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CARPROOF CORPORATION,

Plaintiff,

v.

HYPERQUEST INC.; AUDATEX,
HOLDINGS, LLC; AUDATEX HOLDINGS,
INC.; AUDATEX NORTH AMERICA, INC.;
AUDATEX CANADA HOLDINGS, INC.;
AND SOLERA HOLDINGS, INC.,

Defendants.

Case No. 1:15-cv-7385

Hon. Samuel Der-Yeghiayan
United States District Judge

Hon. Susan E. Cox
United States Magistrate Judge

**AGREED MOTION TO EXTEND DEADLINE
FOR COMPLETION OF FACT DISCOVERY AND RELATED RELIEF**

Defendants HyperQuest, Inc. (“HyperQuest”), Audatex Holdings, LLC, Audatex Holdings, Inc., Audatex Canada Holdings, Inc. (Audatex Holdings, LLC, Audatex Holdings, Inc., Audatex Canada Holdings, Inc. are collectively referred to as “Audatex”), and Solera Holdings, Inc. (“Solera”, and together with HyperQuest and Audatex, the “Defendants”) by and through their undersigned counsel, and with the agreement of Plaintiff CarProof Corporation (“CarProof”), jointly move this Court to extend the April 1, 2016 deadline for completion of fact discovery to June 3, 2016 and to similarly extend subsequent scheduling to reflect said extension. In support of this Agreed Motion, the movants state as follows:

1. On November 18, 2015, the Court entered an order (“Order”) setting April 1, 2016 as the deadline for completion of fact discovery. (ECF No. 26.) The Court also set deadlines for completion of expert discovery and a briefing schedule for dispositive motions. (*Id.*)

2. During the November 18 hearing, and following a colloquy with counsel regarding the scope of anticipated fact discovery including the number of depositions they expect to take, the location of witnesses, and related matters the Court acknowledged that the parties might require additional time to complete fact discovery and instructed the parties to request an extension of the April 1, 2016 deadline if that became necessary.

3. Since entry of the Order, the parties have exchanged and responded to written discovery, but find they require additional time to complete their production of documents and depositions. That is due, in part, to a somewhat complicated discovery process involving the retrieval of Electronically Stored Information which may be relevant to this dispute from a number of custodians at several different Defendant companies, and the time-consuming review of those documents to identify those documents responsive to Plaintiff's request.

4. The parties are in agreement as to the necessity of the proposed extension, which is sought by agreement of the parties, in good faith, and not for reasons of delay or harassment.

5. The extension of the close of fact discovery would necessitate a corresponding extension of the deadlines for the completion of expert discovery and the submission of dispositive motions which are also reflected in the proposed Order.

WHEREFORE, Defendants HyperQuest, Inc., Audatex Holdings, LLC, Audatex Holdings, Inc., Audatex Canada Holdings, Inc., and Solera Holdings, Inc. respectfully request that this Court extend the deadline for completion of fact discovery through and including June 3, 2016, extend the expert discovery and dispositive motions deadlines by approximately 60 days as reflected in the proposed agreed order submitted pursuant to the Court's Case Management Procedures, and grant such other and further relief as the Court deems necessary and just.

Dated: March 1, 2016

Respectfully submitted,

/s/ Elizabeth S. Ralph

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Audatex Holdings, LLC; Audatex Holdings,
Inc.; Audatex North America, Inc.; Audatex
Canada Holdings, Inc.; and Solera Holdings,
Inc.*

CERTIFICATE OF SERVICE

I, Elizabeth S. Ralph, an attorney, hereby certify that on March 1, 2016, I served the foregoing **AGREED MOTION TO EXTEND DEADLINE FOR COMPLETION OF FACT DISCOVERY AND RELATED RELIEF** on all counsel of record via the Court's (ECF) electronic filing service.

/s/ Elizabeth S. Ralph
One of Defendants' Attorneys